

Robert W. Wright

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OTC Markets Group
304 Hudson Street, 3rd Floor
New York, NY 10013

April 11, 2014

RE: Global Holdings, Inc.

This letter is written on behalf of my client, Global Holdings, Inc., a Utah corporation ("Company" or "Issuer") to prepare this legal opinion letter ("Opinion Letter") regarding the Company's Annual report for the Year end December 31, 2013 and submitted to OTC Markets on April 10, 2014. OTC Markets Group is entitled to rely on this letter in determining if the Company has made adequate public disclosure of current information within the meaning of Rule 144(c)(2) under the Securities Act of 1933, as amended, hereinafter referred to as the "Securities Act". I am a resident of the United States and have been retained by the Company as outside general counsel. One part of my duties is to ensure that regular disclosure is made to the public pursuant to the Securities Act and related rules and regulations.

I have examined such current corporate records and other documents and questions of law as I consider necessary for the issuance of this letter. I have relied on information obtained from public officials, officers of the issuer and other sources. I represent that all such sources are believed by me to be reliable. I am authorized to practice law in the State of California, United States District Court Southern District of California, United States District Court Western District of Michigan, and am in good standing. I am permitted to practice before the Securities and Exchange Commission and have not been prohibited from practice thereunder.

It is my understanding that the financials were prepared in accordance with GAAP standards by CS&S Enterprises, Inc. ("CS&S") a business consulting firm employed by the Company, and Kara Craig ("Craig"), Treasurer and a member of the Board of Directors. Craig has provided accounting and preparation of such financial documents for multiple companies over the past twenty years, and graduated from Texas A&M with a degree in business. The 2009 year end statement, 2010 year end statement, 2011 year end statement, 2012 year end statement and 2013 year end statement were not audited.

I have relied on the 2009, 2010, 2011, 2012 year end financial reports of the Company listed in the OTC Disclosure and News Service as follows; 2009 year end report filed on February 10th, 2010; 2010 year end report filed on March 29th, 2011; the 2011 year end report filed on March 23th, 2012; and the 2012 year end report file on April 12, 2013.

I have reviewed the Quarterly Report for the period ending March 31, 2013, filed on May 14, 2013; the Quarterly Report for the period ending June 30, 2013, filed on August 8, 2013; and the Quarterly Report for the period ending September 30, 2013, filed on November 18, 2013. I have also reviewed the Quarterly Report for the period ending September 30, 2012, filed on November 8, 2012 and have subsequently reviewed the Amended Quarterly Report for the period ending September 30, 2012, filed on November 8, 2012.

Furthermore, I have reviewed the Company's "Initial Company Information and Disclosure Statement" filed March 20, 2012 for the period ending December 31, 2011, and subsequently have reviewed the "Company Information and Disclosure Statement-Amended" filed March 23, 2012 for the period ending December 31, 2011 on the OTCMARKET.COM website located at <http://www.otcmarkets.com/stock/WFSV/financials>.

This information constitutes (i) "adequate current public information" concerning the Securities and the Issuer and "is available" within the meaning of Rule 144(c)(2) under the Securities Act of 1934, (ii) includes the information that a broker-dealer would be required to obtain from the Issuer to publish a quotation for the Securities under Rule 15c2-11 under the Securities Exchange Act of 1934 ("Exchange Act"), (iii) complies as to form with the OTC Markets Group's OTC Pink Disclosure Guidelines, which are located on the Internet at www.otcmarkets.com, and (iv) has been posted through the OTC Disclosure and News Service.

The issuer's transfer agent is Transfer Online, Inc., 512 SE Salmon Street, Portland, OR 97214. The transfer agent is registered with the Securities Exchange Commission. I reviewed the Company's public filings to confirm the number of outstanding shares.

I have (i) personally met with management and a majority of the directors of the Company, (ii) reviewed the Information published by the Company through the OTC Disclosure and News Service, and (iii) discussed the Information with management and a majority of the directors of the Company.

To the best of my knowledge, and after discussion with all the Company's directors, neither the Company, any 5% or more shareholder, nor counsel for the Company is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws.

No person other than OTC Markets Group is entitled to rely on this letter. I give OTC Markets Group permission to publish this letter in the OTC Disclosure and News Service for viewing by the public and regulatory bodies.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Robert W. Wright', with a stylized flourish at the end.

Robert W. Wright, Esq.
Associated Counsel

cc: Kara Craig
James McShane
CS&S Enterprises Inc.

U.S. Treasury Department Regulations now require that either we (i) include the following disclaimer in written correspondence or (ii) undertake significant due diligence that we have not performed (but can perform on request).

ANY STATEMENTS CONTAINED HEREIN ARE NOT INTENDED OR WRITTEN BY THE UNDERSIGNED TO BE USED, AND NOTHING CONTAINED HEREIN CAN BE USED BY YOU OR ANY OTHER PERSON, FOR THE PURPOSE OF AVOIDING PENALTIES THAT MAY BE IMPOSED UNDER FEDERAL TAX LAW.

A handwritten signature in black ink, appearing to be 'RW Wright', written in a cursive, stylized manner.

Robert W. Wright, Esq.
Associated Counsel